

Magistrate Judge David W. Christel

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

ENTERED  
COPY

David W. Christel  
Mag. Judge

UNITED STATES OF AMERICA,

NO. MJ14-5257

Plaintiff,

COMPLAINT

v.

18 U.S.C. §§ 2252(a)(2) and (b)(1)  
2252(a)(4) and 2252(b)(2)

DARREL J. DWIGHT,

Defendant.

BEFORE the Honorable David W. Christel, United States Magistrate Judge, U. S.  
Courthouse, Vancouver, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Receipt of Material Constituting or Containing Child Pornography)**

Beginning on a date unknown, and continuing through on or about December 24,  
2014, at Vancouver, within the Western District of Washington, and elsewhere,  
DARREL J. DWIGHT did knowingly receive and attempt to receive visual depictions the  
production of which involved the use of minors engaging in sexually explicit conduct,  
and the visual depictions were of such conduct, using any means and facility of interstate  
and foreign commerce and which images had been mailed and shipped and transported in  
and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and  
2252(b)(1).

COMPLAINT/DWIGHT  
MJ14-5257 - 1

UNITED STATES ATTORNEY  
1201 PACIFIC AVENUE, SUITE 700  
TACOMA, WASHINGTON 98402  
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**COUNT 2****(Possession of Child Pornography)**

Beginning on a date unknown, and continuing through on or about December 24, 2014, at Vancouver, within the Western District of Washington, and elsewhere, DARREL J. DWIGHT did knowingly possess matter that contained visual depictions the production of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United State Code, Sections 2252(a)(4) and 2252(b)(2).

**I. Introduction**

1. I am an Inspector with the United States Postal Inspection Service (USPIS) assigned to the Seattle Division, in Seattle, Washington. I have been so employed since January 21, 2006. I have received formal training from the Inspection Service in the areas of mail fraud, mail theft, identity theft, wire fraud, bank fraud, robberies and burglaries and child exploitation to include formal classroom training. Prior to becoming a Postal Inspector I was a Probation Officer for Maricopa County Adult Probation Officer from February 24, 1997, through January 14, 2006.

2. As a United States Postal Inspector, I am responsible for the investigation of Federal offenses involving the transportation, distribution, receipt, and sale of child pornography through United States mail in violation of Title 18, United States Code, Sections 2251 and 2252.

3. I have received formal training from the Inspection Service in the areas of child exploitation and child pornography to include formal classroom training. Since August 2013, I have been primarily assigned to investigate criminal violations relating to



1 child exploitation and child pornography, including violations pertaining to the illegal  
2 production, distribution, receipt, and possession of child pornography in violation of 18  
3 U.S.C. §§ 2251 and 2252, in the states of Oregon, Washington, Idaho, Montana, and  
4 Alaska. I have received approximately 80 hours of specialized training in the  
5 investigation of child sexual exploitation offenses from the USPIS, SEARCH, and  
6 Internet Crimes Against Children (ICAC) conferences, including the identification of  
7 images depicting minors engaged in sexually explicit conduct.

8 4. The information contained within this affidavit is based on my training and  
9 experience, as well as information related to me by other law enforcement officers,  
10 including Postal Inspector Brian Bone. Postal Inspector Bone has been employed by  
11 USPIS since February 2007 and he is currently assigned to the U.S. Department of  
12 Justice's Child Exploitation and Obscenity Section in Washington, D.C. Postal Inspector  
13 Bone has participated in numerous investigations and search warrant executions  
14 involving child exploitation offenses. Postal Inspector Bone has received extensive  
15 training in computer forensics and digital investigations from the Treasury Computer  
16 Forensic Training Program, National White Collar Crime Center, and the International  
17 Association of Computer Investigative Specialists ("IACIS"), including specialized  
18 training on digital data recovery, and the investigation and analysis of e-mail  
19 communications and Internet activities, such as instant messaging programs, newsgroups,  
20 and forums. Postal Inspector Bone also has received training on the use of specialized  
21 forensic software programs, including I-Look, Encase by Guidance Software, and  
22 Forensic Tool Kit by Access Data. Prior to becoming a Postal Inspector, he worked as a  
23 sworn law enforcement officer within the State of Illinois for over 8 years and was  
24 employed during that time by the Office of the State's Attorney, Lake County, Illinois,  
25 and the Office of the Sheriff, Lake County, Illinois. In this position, he was assigned to  
26 the Cyber Crimes Division and the Child Exploitation Unit, which investigated child  
27 exploitation related offenses and various computer related crimes.  
28

1        5. As further detailed below, based on my investigation and the investigation  
 2 of other law enforcement officers, I submit there is probable cause to believe that  
 3 DARREL DWIGHT has committed the violations described above. In particular, the  
 4 investigation has uncovered that DARREL DWIGHT did knowingly and unlawfully  
 5 receive, attempt to receive and possess child pornography beginning on a date unknown  
 6 and continuing through on or about December 24, 2014.

7            **II. The Sale of Child Pornography by the "Toronto Company"**

8        6. In October of 2010, the USPIS and the Toronto Police Service ("TPS")  
 9 began an investigation into a movie production company that operated a website offering  
 10 DVDs and streaming videos ("films") for sale. The majority of these films feature young  
 11 boys and were marketed as "naturist films from around the world." TPS and USPIS  
 12 determined that this production company (the "Toronto Company") was located in  
 13 Toronto, Canada, and was the subject of more than 20 complaints to the National Center  
 14 for Missing and Exploited Children's Cyber Tip Line regarding the sale of child  
 15 pornography.

16        7. In October 2010, USPIS Inspectors accessed the Toronto Company's  
 17 website (www.azovfilms.com) and were able to review film previews, website movie  
 18 summaries, and customer ordering information. On six occasions between February and  
 19 April, 2011, USPIS Inspectors from Brentwood, Tennessee, conducted controlled  
 20 purchases of DVDs via the Toronto Company's online ordering system. By way of  
 21 example, one of the videos purchased from the Toronto Company via an undercover  
 22 purchase was titled "Cutting Room Floor – Vlaviu." The Toronto Company's website  
 23 described this film as follows:

24        we sweep up the cutting room floor to bring you tow action-packed discs of  
 25        ooey-gooley slippery goodness with Vlaviu and his friends, Lore and Luci!  
 26        Like our original . . . this is all the footage that didn't make the cut over the  
 27        last 2-years from our Boy Fights series! This two disc set features Vlaviu  
 28        and his buddies going commando in a very unique way. They're sweet  
       enough, but that didn't stop them from breaking out the sugary cupcakes  
       and giving you a whole new perspective on nudist food fighting! One this  
       is for sure . . . there's no laundry to do tonight!



1        8.        The video depicts minor boys seen naked in an apartment living room  
2 setting eating desserts and other food. There are several close-ups of the minors' genitals  
3 and pubic area as they eat desserts and towards the conclusion of the film several of the  
4 boys are filmed while sitting naked on the desserts and placing the remnants in their  
5 anuses.

6        9.        Law enforcement determined that the "Toronto Company" has a shipping  
7 facility located in North Tonawanda, New York, and that the undercover online orders  
8 were transferred from the "Toronto Company" to this New York based shipping facility  
9 for fulfillment. These undercover orders were then shipped from North Tonawanda, New  
10 York, via USPS Priority Mail to a post office box in Nolensville, Tennessee.

11       10.       TPS executed a search warrant on the Toronto Company's business  
12 premises on May 1, 2011, and seized hundreds of DVD movies, photo DVDs, computers,  
13 and business records, including customer shipping labels and customer order histories.  
14 Many of the DVD movies included the exhibition of the genitals of nude minors. Law  
15 enforcement determined that these films were being shipped to customers worldwide,  
16 including hundreds of individuals residing in the United States. Law enforcement also  
17 determined that for those orders placed from the United States, the Toronto Company  
18 would fill those orders via USPS Priority Mail.

19       11.       The Toronto Company, as well as its two operating principals, were  
20 subsequently charged and are being prosecuted in Canada for child exploitation offenses,  
21 including the production and distribution of child pornography.

### 22       **III. Defendant's Receipt of Child Pornography From The Toronto Company**

23       12.       USFIS conducted a review of certain records contained in the Toronto  
24 Company's customer database and located one customer, DARREL DWIGHT, with an  
25 address of 1202 NW 52nd St., Vancouver, WA 98663, and determined that, on two  
26 occasions, DWIGHT purchased child pornography from the Toronto Company's  
27 website. USFIS extracted the customer invoices and purchase summary from the  
28 database, which detailed the purchase transactions made by DWIGHT. A summary

1 review of the transactions showed that between October 11, 2008, and January 12, 2009,  
2 DWIGHT purchased 5 movies on 2 different occasions via the Toronto Company's  
3 website, totaling \$166.70 in United States currency.

4 13. All of the Defendant's transactions reviewed by USPIS employees were  
5 associated with the Defendant's current residence. The customer records related to this  
6 individual show that the purchaser used the following email as the confirmation email on  
7 the order: "dardwight@aol.com." In addition to the contact information discussed above,  
8 the business records associated with each customer transaction also captured the date an  
9 order was placed and the IP address associated with the computer used to place the order.  
10 Additionally, each customer transaction had a product identification number which  
11 corresponded to a specific video or DVD available for purchase.

12 14. Below is a summary of the relevant information for DWIGHT's first order:

13 October 11, 2008 – Order Number 35439  
14 70118—FKK Memoirs (1992) |DVD  
15 70106—FKK Corsica |DVD  
16 70060—Oliver & Friends|DVD  
17 70012—Vladik Anthology 11:13|DVD

18 15. According to the Toronto Company records, all of the DVDs were shipped  
19 Air Mail via USPS Mail.

20 16. Below is a summary of the relevant order information for DWIGHT's  
21 second order:

22 January 12, 2009 - Order Number 40278  
23 70129-Boy Fights XIX: Triple Threat (2009) |DVD.

24 17. According to the Toronto Company records, the additional photo DVD of  
25 "Boy Fights XIX: Triple Threat" was added to the movie order for an additional \$20.00.  
26 The movie and photo DVD were mailed via USPS Mail.

27 18. Below is a description of a sample of the video "Vladik Anthology  
28 11:13|DVD" ordered by DWIGHT:



1 The movie is approximately 1 hour and 14 minutes and 35 seconds  
 2 (01:14:35) in length. The movie is in a foreign language, it has no story  
 3 line, and is series of videos of clothed or nude minor boys playing at the  
 4 beach, riding bicycles, showering, playing in and around a pool, or dancing.  
 5 The movie starts with two prepubescent boys playing on the beach with a  
 6 raft. At approximately 2:59 one boy is laying on the raft with the blonde  
 7 boy is lying next to him on the beach. The camera focuses in on the genital  
 8 area of the boy on the raft from above. From approximately 5:50 to 5:57  
 9 the blonde boy is seen standing in the water gripping the shaft of his penis.  
 10 At approximately 25:20, a nude prepubescent boy is pool side with a hat  
 11 on, a knife in one hand, and a watermelon on the bench. The camera  
 12 focuses in on the boy's genital area. From approximately 25:45 to 25:50 the  
 13 same nude boy is seen sitting on a bench cutting the watermelon with his  
 14 legs spread apart and the camera focused on his genital area. From  
 15 approximately 51:21 to 1:00, a prepubescent boy is seen wearing a black  
 16 with a red stripe beanie, and motorcycle gear on his chest on a bed. The  
 17 minor boy is seen doing handstands, jumping on the bed, and at one point  
 18 lying on the bed while the camera is in an upward angle from his feet to his  
 19 head focusing on the boy's genital area. At approximately 1:00, three boys  
 20 are seen sitting around a table. Two of the boys are naked and one minor  
 21 boy is wearing underwear. At approximately 1:01:25, the nude blonde boy  
 22 is lying on his side with one leg bent, the other leg flat and his genital area  
 23 is exposed. The camera angle is focuses across the blonde boy's genital  
 24 area as the other boy leaves. The three boys are seen showering together.  
 25 At approximately 1:08 to 1:09:56, the three nude prepubescent boys are  
 26 seen taking turns doing handstands, break dancing, and spinning on the  
 27 floor while the camera is over the top of their genital area. At  
 28 approximately 1:11:35 to 1:12:35, a nude prepubescent boy is seen standing  
 at the pool ladder. The camera angle is looking up towards the nude boy's  
 penis.

19. Below is a description of a image "Boy Fights XIX-Photo-  
 BFXIX\_0035.jpg" ordered by DWIGHT:

The picture depicts a nude pubescent male doing a headstand on a white  
 mattress. The pubescent's penis is pointing down towards his head and his  
 scrotum and anus is exposed to the camera. There is a second boy in the  
 room but only his head is seen over the anus of the first pubescent male.

20. Within a website associated with child pornography (Website A), agents  
 discovered DWIGHT utilized the user name "dsmile" with an email address of

1 dardwright@aol.com. DWIGHT also utilized dardwright@aol.com as the confirmation  
2 email for both of his Toronto Company orders.

3 21. Additionally, a review of records provided by the shipping facility in North  
4 Tonawanda, New York, included mailing labels placed on the shipments that were  
5 delivered by USPS. These business records showed that a mailing label for DARREL  
6 DWIGHT with an address of 1202 NW 52nd St., Vancouver, WA 98663, was produced  
7 for the orders on October 11, 2008, and January 12, 2009. According to the shipping  
8 facility in North Tonawanda, New York, the label was put on the order in New York and  
9 the completed package was provided to USPS for delivery.

#### 10 **IV. Defendant's Receipt of Child Pornography From "Website B"**

11 22. As part of its law enforcement activities, USPIS conducted an undercover  
12 operation using a website herein identified as Website B. As part of the undercover  
13 operation, USPIS investigators send an email to prior customers of the Toronto Company  
14 stating they have created a new website that contains videos of very young boys and girls  
15 "playing naughty." The email informed the target individual that Website B contains all  
16 minors and no adults to include "some soft and hardcore." The email includes a link to  
17 Website B and a special access code requiring the user to register for a free account.

18 23. On December 3, 2014, USPIS undercover agent sent DWIGHT an email to  
19 the email address associated with his Toronto Company order and Website A account:  
20 "dardwright@aol.com." The email included a code to access Website B. In order to gain  
21 entry to Website B, DWIGHT was required to create a user account. On December 3,  
22 2014, at 11:29 p.m. PST, DWIGHT created an account for Website B with user name  
23 "dsmile" with the email address "dardwright@aol.com." DWIGHT's Website A user  
24 name was also "dsmile." On December 3, 2014, at 11:50 p.m. PST, DWIGHT created a  
25 second account for Website B with the user name "djd" linked to the email address  
26 "dwightvancouver@aol.com."

27 24. On December 5, 2014, between 6:43 a.m. PST and 6:57 a.m. PST,  
28 DWIGHT with account user name "dsmile" and IP address 174.25.127.18 attempted to



1 download 19 movies from Website B. The movies included movie titles of "Horny Little  
 2 Billy (12yo) Stokes His Dad's Dick" and "13 Year Old Boy Plays with Daddy's Dick."  
 3 "Horny Little Billy (12yo) Stokes His Dad's Dick" was described on Website B as:

4 Little Billy was horny and couldn't wait! Watch Billy (12 years old) stroke  
 5 his hard little dick as Daddy watches. Billy even has a surprise guest who  
 6 comes to finish the job! Enjoy as Billy and the surprise guest suck and fuck  
 7 each other until Billy cums all over. But not before he takes a load to the  
 8 face! Very sexy and all fun." Movie "13 Year Old Boy Play with Daddy's  
 9 Dick" is described as "Come see a shy little boy find pleasure with Daddy!  
 10 Watch while Jose (13 years old) strokes Daddy's throbbing cock, and then  
 11 begins to play with his own hard little dick. Enjoy as Jose pleases Daddy  
 and himself! You will love his face when he cums! 11 chapters of sexy fun  
 times with guest visiting from Jonathan and other boys.

12 25. On or about December 12, 2014, the United States Department of Justice  
 13 Criminal Division, Child Exploitation and Obscenity Section issued an administrative  
 14 subpoena to CenturyLink for IP address 174.25.127.18 on December 5, 2013 at 6:45 a.m.  
 15 GMT, which was the IP address used to download videos from Website B. On or about  
 16 December 16, 2014, CenturyLink confirmed DWIGHT has been the subscriber to said IP  
 17 address at his current residence since May 15, 2009.

18 **V. Federal Search Authorization and Defendant's Possession of**  
 19 **Child Pornography**

20 26. On December 24, 2014, at 7:27 a.m., federal agents executed a search  
 21 authorization of the Defendant's residence at 1202 NW 52<sup>nd</sup> Street, Vancouver,  
 22 Washington. Upon encountering the Defendant in his bedroom, agents recovered two (2)  
 23 thumb drives in the Defendant's left front pocket.

24 27. Before agents could administer Miranda warnings to the Defendant, he  
 25 spontaneously stated "it's all me." Agents then conducted a preliminary forensic analysis  
 26 of the thumb drives and determined they contain approximately 6000 files to include  
 27 approximately 600 images containing suspected child pornography.  
 28

1       28.    Within these 600 files, agents discovered the image, "40727748Dpz.png,"  
2 which depicted the following:

3           A prepubescent male sitting in a chair with an erect penis showing through  
4 his boxers.

5       29.    Another recovered image, "Door 7.png," depicted:

6           A pubescent nude male standing over a camera with his face  
7 showing. The camera is focused between the minor's legs and upon  
8 his erect penis.

9           **VI.   Characteristics Common to Individuals Involved in the Receipt of**  
10           **Child Pornography**

11       30.    Based upon my knowledge, experience, and training in child pornography  
12 investigations, and the training and experience of other law enforcement officers with  
13 whom I have had discussions, I know that there are certain characteristics common to  
14 individuals involved in the receipt and attempted receipt of child pornography.

15       31.    Those who receive and attempt to receive child pornography, or who have  
16 been previously convicted of a child pornography offense, may receive sexual  
17 gratification, stimulation, and satisfaction from contact with children; or from fantasies  
18 they may have viewing children engaged in sexual activity or in sexually suggestive  
19 poses, such as in person, in photographs, or other visual media; or from literature  
20 describing such activity.

21       32.    Those who receive and attempt to receive child pornography, or who have  
22 been previously convicted of a child pornography offense, may collect sexually explicit  
23 or suggestive materials, in a variety of media, including photographs, magazines, motion  
24 pictures, videotapes, books, slides and/or drawings or other visual media. Such  
25 individuals oftentimes use these materials for their own sexual arousal and gratification.  
26 Further, they may use these materials to lower the inhibitions of children they are  
27 attempting to seduce, to arouse the selected child partner, or to demonstrate the desired  
28 sexual acts.



1        33. Those who receive and attempt to receive child pornography, or who have  
2 been previously convicted of a child pornography offense, often possess and maintain  
3 their "hard copies" of child pornographic material, that is, their pictures, films, video  
4 tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape  
5 recordings, etc., in the privacy and security of their home or some other secure location.  
6 These individuals typically retain pictures, films, photographs, negatives, magazines,  
7 correspondence, books, tape recordings, mailing lists, child erotica, and videotapes for  
8 many years.

9        34. Likewise, those who receive and attempt to receive child pornography, or  
10 who have been previously convicted of a child pornography offense, often maintain their  
11 collections that are in a digital or electronic format in a safe, secure and private  
12 environment, such as a computer and surrounding area. These collections are often  
13 maintained for several years and are kept close by, usually at the individual's residence,  
14 to enable the collector to view the collection, which is valued highly.

15        35. Those who receive and attempt to receive child pornography, or who have  
16 been previously convicted of a child pornography offense, also may correspond with  
17 and/or meet others to share information and materials; rarely destroy correspondence  
18 from other child pornography distributors/collectors; conceal such correspondence as  
19 they do their sexually explicit material; and often maintain lists of names, addresses, and  
20 telephone numbers of individuals with whom they have been in contact and who share  
21 the same interests in child pornography.

22        36. Those who receive and attempt to receive child pornography, or who have  
23 been previously convicted of a child pornography offense, prefer not to be without their  
24 child pornography for any prolonged time period. This behavior has been documented by  
25 law enforcement officers involved in the investigation of child pornography throughout  
26 the world.

27        37. Based on the amount of purchases from the Toronto Company, DWIGHT's  
28 involvement as a director of child care and involved with a local boy scout group, gives

1 him access to children who are the same age and gender of the children of the items  
 2 ordered, and he currently is looking for videos of children in the same age range for  
 3 download on Website B, DWIGHT likely displays characteristics common to individuals  
 4 involved in the receipt or attempted receipt of child pornography.

### 5 VII. Conclusion

6 38. Based on the above facts, I respectfully submit that there is probable cause  
 7 to believe that DARREL J. DWIGHT did knowingly and unlawfully receive, attempt to  
 8 receive and possess child pornography, in violation of Title 18, United States Code,  
 9 Sections 2252(a)(2) and (b)(1), and 2252(a)(4) and (b)(2).

10   
 11 Connie Worrel, Complainant  
 12 Postal Inspector, USPS  
 13

14 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
 15 presence, the Court hereby finds that there is probable cause to believe the Defendant  
 16 committed the offenses set forth in the Complaint.

17 Dated this 24th day of December, 2014.

18   
 19 DAVID W. CHRISTEL  
 20 United States Magistrate Judge  
 21 ENTERED  
 22 COPY  
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